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FEB - 6 2006

Federal Communications Commission
Office of Secretary

February 6, 2006

BY HAND DELIVERY

Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
c/o Natek, Inc., Inc.
236 Massachusetts Avenue, N.E. Suite 110
Washington, DC 20002

**Re: Certification of CPNI
EB Docket No. 06-36
EB-06-TC-060**

CPNI Compliance Certification for

Lackawaxen Telecommunications Services, Inc. 499 Filer ID No.

Dear Ms. Dortch:

On behalf of the telecommunications carrier listed above, John Staurulakis (JSI), its consultant is filing the attached CPNI Certification together with the statement of procedures for operational compliance with FCC's CPNI rules.

Sincerely,

Scott Duncan
JSI Staff Director-Regulatory Affairs
sduncan@jsitel.com

Attachment

Copies: 4 additional copies to Secretary
Byron McCoy, Telecommunications Consumers Division
Best Copy and Printing (BCPI)

10. of Copies rec'd 044
List A B C D E

Echelon Building II, Suite 200
9430 Research Boulevard, Austin, Texas 78759
Phone: 512-338-0473
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1380 Corporate Center Curve
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547 South Oakview Lane
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Phone: 801-294-4576
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4625 Alexander Drive, Suite 135
Alpharetta, Georgia 30022
Phone: 770-569-2105
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Compliance Certification

I, Mark Zarambo Vice President/General Manager of Lackawaxen Telecommunications Services, Inc., do hereby certify based on my personal knowledge, that Lackawaxen Telecommunications Services, Inc. is in compliance with the Federal Communications Commission's Customer Proprietary Network Information (CPNI) Rules.

Date 9/30/2005



Mark Zarambo
Vice President / General Manager

Description of CPNI Compliance

1. Does your company have a program in place to train employees on the permissible/impermissible uses of CPNI? Yes X No
2. Describe the training program, including the frequency of the training/re-training, who conducts the training, and the scope of the training.

Scope of Training: Employees are instructed in a group session on the FCC's definition of what constitutes CPNI and the proper and improper use of CPNI. Employees are also provided information on when it is necessary to get permission to use CPNI, whether that permission is to be obtained from the customer or from their supervisor, and on the procedures that should be used to obtain such permission. The training session also includes information on the company's marketing practices, how the CPNI rules apply to those practices, and instruction on the approval process that must be followed prior to the launch of any marketing campaign.

Frequency of Training: Training is conducted annually, or more often if needed.

Instructor: Business Office Manager

3. Does your company include training on the uses of CPNI in its orientation program for new employees? Yes X No
4. Describe the CPNI training program for new employees, including the scope and who conducts the training.

Scope of Training for New Employees: New employees are individually instructed in a one on one session on the FCC's definition of what constitutes CPNI and the proper and improper use of CPNI. New employees are also provided information on when it is necessary to get permission to use CPNI, whether that permission is to be obtained from the customer or from their supervisor, and on the procedures that should be used to obtain such permission. The orientation session also includes information on the company's marketing practices, how the CPNI rules apply to those practices, and instruction on the approval process that must be followed prior to the launch of any marketing campaign. New employees are also instructed, at this session, on the company's general policy regarding the confidentiality and restrictions on the use of both customer and company information.

Instructor: Business Office Manager

5. Has your company instituted disciplinary procedures for employees who do not adhere to the FCC restrictions on the use of CPNI? Yes X No

If so, what are they?

Disciplinary Procedures for Employees: The company maintains a documented progressive discipline policy which is on file at the business office and contained within the employee handbook, which is provided to each employee as part of their orientation process. Section 4.16 of the handbook describes the progressive discipline process. A brief outline of that section includes a four step process of disciplinary action for employees that fail to comply with documented company procedures: 1) verbal warning 2) written warning 3) suspension with or without pay 4) termination of employment

6. The FCC rules require that sales personnel must obtain a supervisor's approval for "any proposed outbound marketing request" and maintain records of this approval process for at least one year. Does your company have a supervisory review process for "outbound marketing situations"? Yes X No

If so, describe that supervisory process.

Review process for Outbound Marketing: All outbound marketing programs are developed under the supervision of the Business Office Manager. Each customer's account is "flagged" in the customer service system if the customer has elected to "opt-out" from receiving company generated marketing material. Customer Service personnel assemble the marketing material that will be distributed and verify that customers who have "opted-out" are not included in the distribution. The Business Office Manager then provides a final approval of the outbound marketing to ensure that it complies with CPNI regulations, a log entry is made to record the marketing effort, and the material is distributed to the proper customers.

7. Does your company maintain its records of compliance with the outbound marketing review process for a minimum of one year?

Yes X No